257258

RELIANCE TRAILER CO., LLC

3025 S. Geiger Blvd., Spokane, WA 99224
Telephone: (509) 455-8650 • Fax: (509) 747-4811

October 8, 2003

Administrator
U.S. Department of Transportation
400 7th Street, S.W., Nassif Building
Room PL-401
Washington, DC 20590-001

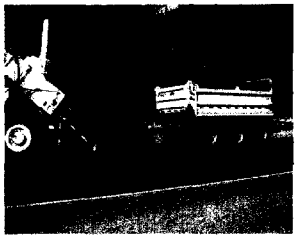
Re: Comments on Docket No. NHTSA-03-14396, RIN 2127-A156, FMVSS No. 224; Rear Impact Protection.

Dear Administrator: NHTSA-03-14396-6

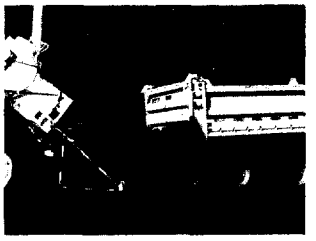
Reliance Trailer Co., LLC manufactures a road construction controlled (RCC) vehicle for delivering asphalt and other building materials to construction sites. In order to deliver the material to the paving machine the material must be moved from front to rear in a horizontal direction from the delivery vehicle into the paving machine hopper. Rather than a conveyor belt that deposits asphalt into the paving machine hopper, our vehicle deposits material to the paving machine by lifting the front of the body up and allowing the asphalt to slide out the back of the body into the hopper.

The unloading operation requires the paving machine to occupy the same space required by the underride guard. We have had the same problems of design as have the other manufactures of trailers that deliver asphalt to paving operations. We were granted a temporary exemption (Docket No. 2001-10044, Notice 2) and currently have applied for an extension to the exemption.

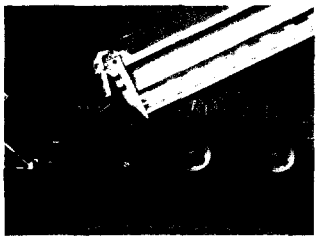
Asphalt paving machines vary in size and complexity, however they are consistent in the way they hook up to asphalt delivery vehicles (See Attached graphics). The paving machine typically is positioned directly behind the delivery vehicle in very close proximity to the rear axles and in some cases attaching itself to the rear axle. Plates 1 thru 6 illustrate the relationship between a type of paving machine and a pony trailer with a gravity feed dump body. Plate 7 illustrates the paving machine before the dump body is raised. The end of the body must extend into the hopper far enough to deposit the asphalt material as shown in plate 8. Paving machines vary in size. In general, they are designed to fit under the frame of the delivery vehicle and push up against the back tires. There is very little open space between the paving machine and the delivery vehicle. Such a confined space makes installation of any moveable or retractable underride guard highly impractical. The installation of an underride guard on our trailer would substantially impair the functionality of the vehicle.



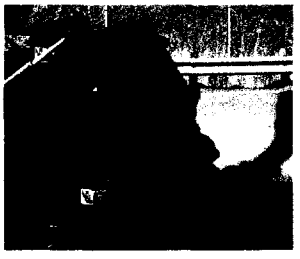
1.



2.

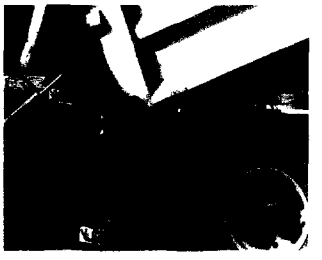


3.



4.

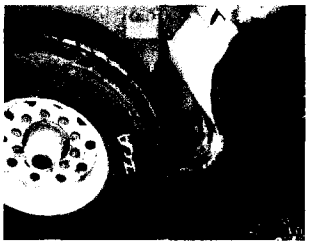
5.



6.

7.

8.



9.

Columbia Body Manufacturing Co., who manufactures a similar vehicle, was granted an exemption (Docket No. 2002-13955, Notice 2) until February 1, 2006. In the notice it was stated in "The Agency's Findings in Support of an Exemption", that "there is no substantial difference between Columbia Body's petition and other hardship applications that we have granted in the past (e.g., Red River Manufacturing, Inc., and Dan Hill & Associates, Inc., 66 FR 20028)".

Pony trailers are typical to the West Coast. They discharge their payload by raising the front of the dump body up and allowing the material to slide out the back of the body. The body is raised by a hydraulic hoist that is supported by the trailer frame at one end and attached to the front of the body at the other end. When the hoist is extended, the body is raised by pivoting on hinges that attach the body to the trailer frame at the rear. The wheels maintain contact with the ground and the frame remains level as the body pivots up. Conveyor belt type semitrailers are unpopular in the West due to difficulty in achieving maximum allowed gross vehicle weight while maintaining maneuverability. A two vehicle

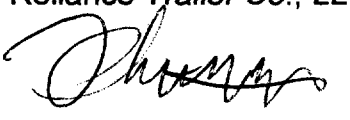
combination of a truck with a dump body pulling a trailer with a dump body is a commonly accepted method of achieving the highest gross vehicle weight allowed while maintaining maneuverability on our western roads. The gravity feed dump bodies are simple, light weight and easy to use and maintain. Mechanical drive conveyors installed on these units would be impractical because of increased weight, complexity and cost.

The question of whether the installation of an underride guard is practical on a vehicle designed to deliver asphalt to a paving machine is a function of how the paving machine interfaces with the delivery vehicle. Delivery mechanisms must be designed so they extend far enough into the hopper so material will not spill out.

We recognize and agree with the need to narrowly define exempt vehicles. However, our gravity feed dump trailers face the same problems of installing a functional, practical underride guard as trailers fitted with mechanical drives and conveyor belts. While the 18 inch – 24 inch overhang required by our trailer is greater than the 12 inch requirement for "wheels – back" it is similar to what is stated as needed for a horizontal discharge trailer (Docket No. NHTSA-03-14396). Our trailers provide a valuable service in providing material to the road construction industry in safe, efficient manner.

We ask that the definition of a RCC horizontal discharge trailer be written to include a gravity feed dump trailer in which the front of the body raises up to dump the load out the back while the frame remains horizontal and the wheels remain on the ground.

Respectfully,
Reliance Trailer Co., LLC



Phil Ito
Product Management Group Administrator